

USEPA/OECA/OC
State and Tribal Assistance Grant (STAG) 2000-2001
Missouri: Hazardous Waste Enforcement Data Quality Improvement Project
Quarter 2, 2002 report
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REPORTING PERIOD: January 1, 2002 through March 31, 2002

I. INFORMATION:

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|-------------------------------|---|
| State and Department: | Missouri Department of Natural Resources |
| Title of Project: | Hazardous Waste Enforcement Data Quality Improvement Project Enforcement and Compliance Assurance Grants |
| Grant Contact Person: | Kathy Flippin, Hazardous Waste Unit Chief |
| Funds Received by State: | July 1, 2001 |
| EPA Regional Project Officer: | Carol Clopton |
| Author of Report: | Millie Wieberg, Data Quality Analyst |

II. STATUS OF PROJECT MILESTONES

(The dates on the schedule in the Narrative Description of Project which assumed a project period of April 1, 2001 through March 31, 2002 were adjusted below to reflect when funds were received by the state to begin the project. The Project Period on the Grant Agreement is May 15, 2001 through June 30, 2002, but funds were not received until July 1, 2001. Therefore, all anticipated completion dates are moved three months forward from the date of April 1, 2001 that was originally anticipated in the Narrative Description of Project.)

| PROJECT MILESTONES | ANTICIPATED COMPLETION DATE | COMPLETION DATE |
|---|-----------------------------|-----------------|
| Complete work on RCRAInfo to July 1, 1990 | December 31, 2001 | Ongoing |
| Data review/repair completed for enforcement data in HWP's I&E database to July 1, 1998 | December 31, 2001 | Ongoing |
| Data review/repair of inspection data in HWP's I&E database to June 30, 1995 | December 31, 2001 | Ongoing |
| Complete ongoing data improvement in HWP's I&E Database and ETS | Ongoing | Ongoing |
| | | |

III. STATUS OF PROJECT COMPLETION

The third quarter of the project is complete and work began on correcting and entering data for the more complex and lengthy cases. I have found that it is most efficient to address problems as they are encountered rather than on a 5-year schedule as originally proposed in the Narrative Description of the Grant. EPA Region VII staff has provided reports showing open cases and missing information. I have been working to correct these as they are encountered on the list.

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IV. RESULTS

We continue to be current in entering and updating RCRAInfo as the Handler and Evaluation Logs (HELs) are received with the exception of four facilities. Three facilities have been entered into HWP's I&E database, but the EPA ID number does not appear in RCRAInfo. The fourth facility is listed under different names in RCRAInfo and HWP's I&E database. As soon as this is corrected the information will be entered into RCRAInfo.

Work continued on checking FY 2000 inspections where no final HELs had been received. A separate list of facilities not returned to compliance was made for record check. Forty-three of 139 facilities needed record check. Enforcement Specialist Mike Menneke, assisted with part of the record check. The record check consisted of reviewing case files, obtaining evaluation dates, violation types, assigning sections and numbers for linking purposes, finding return to compliance dates, enforcement dates, enforcement types, penalty amounts, and penalty payment dates.

An ongoing activity involves consulting with the Enforcement Specialists to resolve errors/conflicting information previously entered in the data systems (Tom Judge-Mallinckrodt, Keith Bertels-Millennium, Alicia Davenport-Ralph Hutchison Salvage), etc.

On January 29, 2002 Mrs. Flippin and I consulted with Duan Bills, our Hazardous Waste Program Computer Information Technologist requesting queries from HWP's I&E database to show cases without return to compliance dates. The query report received by E-mail the following day listed additional facilities for data comparison and record checks.

I worked with Keith Bertels, Enforcement Specialist, running queries off HWP's I&E database for permitted treatment/storage/disposal facility inspections.

Mrs. Flippin provided copies of the Missouri Hazardous Waste Management Commission reports. These reports have narrative descriptions of most enforcement actions taken each month from the present back to state fiscal year 1992. She provided instruction regarding proper codes for enforcement actions (310 = Abatement Orders, Settlement Agreements, 410 = Referral to Attorney General's Office, 500 series = date filed in Court). Information from the Commission reports indicated that a number of database entries had to be verified and updated. This process was very time-consuming and confusing. Some of the problems encountered were as follows:

- 1) Abatement Orders and Settlement Agreements were never entered into RCRAInfo.
- 2) Penalty amounts were not entered.
- 3) Payment penalty dates were not entered.
- 4) Some evaluations/violations had not been entered into the system.

- 5) A few of the facilities did not have an EPA or Missouri ID number.
- 6) The HEL form could not be located (never completed or filed under previous unknown facility name).
- 7) Some facilities have more than one vendor number (Eagle Picher Industries of Joplin, Amyx Mfg.).
- 8) In some of the older cases, the needed information is non-existent.

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- 9) Occasionally the case file was checked out to another employee (sometimes as long as 1 or 2 years).
- 10) Often the entire case file had to be scanned/read to obtain correct information. I still need to complete years 1993 and 1992 of the Missouri Hazardous Waste Management Commission report. In addition, there are several facilities with a variety of problems/questions that will need to be resolved during a conference with Mrs. Flippin.

Mrs. Flippin provided a stack of RCRAInfo reports from the EPA Region VII, listing facilities that had never been inspected. Using these reports, Mike Menneke, Enforcement Specialist, searched HWP's I&E database to find those that had been inspected. These inspections will be entered into RCRAInfo. They date from 10/2/01 to 1992 and include 190 Large Quantity Generators, 3,133 Small Quantity Generators, 1,006 Conditionally Exempt Small Quantity Generators, and 256 Transporters for a total of 4,585 facilities. We have completed the RCRAInfo search for all of the above, except for approximately half of the Small Quantity Generators. HELs have been completed for the missing info noted above, but have not yet been entered into RCRAInfo due to the need for record verification before entering.